UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED
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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY: EC DEPUTY

UNITED STATES OF AMERICA, Plaintiff. v. Helen CAVANAUGH Defendant.	Magistrate No. '08 MJ 2230 COMPLAINT FOR VIOLATION OF Title 18, U.S.C. § 641 (Theft of Government Funds)

The undersigned complainant, being duly sworn, states:

On or about between August 15, 2003 and September 2006, within the Southern District of California, defendant Helen CAVANAUGH did knowingly embezzle, steal, purloin, and knowingly convert to her own use money of the United States Department of Labor, a department or agency of the United States, namely, approximately $21,146.00 in Black Lung Program benefits which were mailed to CAVANAUGH as the representative payee for the benefit of Helen Wasylchuck, to which she knew she was not entitled, in violation of Title 18, United States Code, Section 641.

And the complainant states that this complaint is based upon the attached statement of facts that is incorporated by reference herein.

Michael Blaz
SIGNATURE OF COMPLAINANT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 17TH DAY OF JULY

MAGISTRATE JUDGE